

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-10943 (MEW)
)
) (Jointly Administered)
)

**MOTION FOR PRODUCTION OF DOCUMENTS
AND RESOLUTION REGARDING CREDITOR'S CLAIM**

I Marcio Ferreira, the creditor in the above-captioned case, hereby moves this Court for the production of documents and resolution regarding creditor's claim. In support of this motion, the following is submitted:

On September 26, 2022, the creditor filed a claim for the amounts listed below for each coin owned that is in Voyager's custody:

Claim Identifier: 811

Debtor name: Voyager Digital Holdings, Inc.

Claim Reference Number: VOY-19085

Claim number: 10607

Date Filed: 09/26/2022

BITCOIN (BTC): 348097

ETHEREUM (ETH): 36973

SHIBAINU (SHIB): 176285212

The claim was accepted and processed by the court and debtors.

However, the debtors have filled a motion on February 24, 2023, claiming that my claim amount is inaccurate and filled for a reduction in amount based on the merits for voting purposes.

During our last court hearing on February 22, 2023, your honor has asked us to try to work things out and come to an agreement, however, that did not happen.

I have asked the debtors attorneys for the documents on my account with voyager, but they were unable to provide any accurate information aside from the date of opening the account and one transaction.

I Asked the debtors attorneys to send me those documents, they did send me partial documents which was also attached to Mr. Renzi's Motion filled on Feb 24 at 12am

Upon reviewing the partial screenshot provided by the debtors in their response to my claim, it appears that there may be some confusion regarding the claim. The amount listed for each crypto coin, except for SHIB, is inaccurate. There is an additional zero added in front of the actual amount of crypto coins, Therefore, the records held by the debtors are inaccurate.

Regarding the Debtors' objection to the merits of the claim, the creditor would like to inform the Court that there were internal transactions on the "internal" blockchain that Voyager has or had that may not have been reflected in the debtors' records. The creditor has reason to believe that Voyager has since transferred all the coins out of the initial wallet in the voyager app to an aggregated wallet together with all other investors/creditors.

The creditor understands that a consensual resolution or production of documents will be required to address this matter. The creditor would be happy to submit all documentation regarding the transactions to support the motion.

As a concerned party, the creditor believes it is in the Debtors' best interest to work things out in the best possible outcome for all. If the creditor is required to file a motion to retrieve the crypto, it may result in unnecessary burden. Therefore, the creditor would appreciate it if the Court could let them know what steps the Debtors will take regarding the claim.

The creditor requests that the Court order the production of all relevant documents regarding the claim, including but not limited to Voyager's internal blockchain transactions, in order to accurately determine the value of the claim.

Lastly, the creditor requests a copy of the order granting the Debtors the ability to lower the creditor's claim, as mentioned by the debtors during a phone conversation.

WHEREFORE, the creditor respectfully requests that this Court grant this motion and order the production of all relevant documents regarding the claim, as well as a resolution regarding the claim.

Dated: February 24, 2023



/s/ Marcio Ferreira

71 Beech St,
New Jersey, NJ 07031

Exhibit A

Deposits into Voyager's System on November 11, 2021



Marcelo Ferreira <marciobr20@gmail.com>

You just sent 2345.7182 BTC to Voyager

1 message

Coinbase Pro <no-reply@coinbase.com>
To: marciobr20@gmail.com

Wed, Nov 10, 2021 at 10:13 AM

coinbase PRO



You just sent 2345.7182 BTC

Congratulations! You have successfully sent 2345.7182 BTC to Voyager. You can view transaction details in your Coinbase Pro account. To facilitate this transaction, you paid 0.00042824 BTC in network fees.

[View Transfer](#)

This is a service message. [Privacy Policy](#)

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Exhibit B

Asking Voyager support about my BTC November 2021



Marcio Ferreira <marciobr20@gmail.com>

Important Information Regarding Your Voyager Account

Matt (Support) <support@investvoyager.com>
Reply-To: Support <support@investvoyager.com>
To: Marcio Ferreira <marciobr20@gmail.com>

Fri, Nov 12, 2021 at 2:24 PM

Your request has been updated. To add additional comments, reply to this email.



Matt (Voyager Support)

Nov 12, 2021, 2:24 PM EST

Hi Marcio,

To answer your questions, Voyager internally operates as a clearing house similar to how any normal fiat currency broker would. When deposit funds into your Voyager account, we credit your account the amount of your deposit on our internal ledger and then move the funds to a secure central location. This is the second transaction you saw of your coins moving to a second wallet. If you were to withdraw funds from your Voyager account, you would see the funds come from our central wallet address rather than your depositing address.

Similarly, when you are credited \$100 worth of BTC for a promotion, we are again crediting you account with the BTC on our internal ledger but we are not moving BTC on the blockchain to a dedicated wallet in your name. If you desire to hold your tokens in your own wallet you would need to withdraw them from Voyager. Until the funds are withdrawn, they remain in Voyagers custody in a mix of cold storage and hot storage to keep assets liquid and secure.

Let us know if you have any further questions or require further assistance.

The Voyager Team

VOYAGER



Marcio Ferreira

Nov 11, 2021, 1:38 PM EST

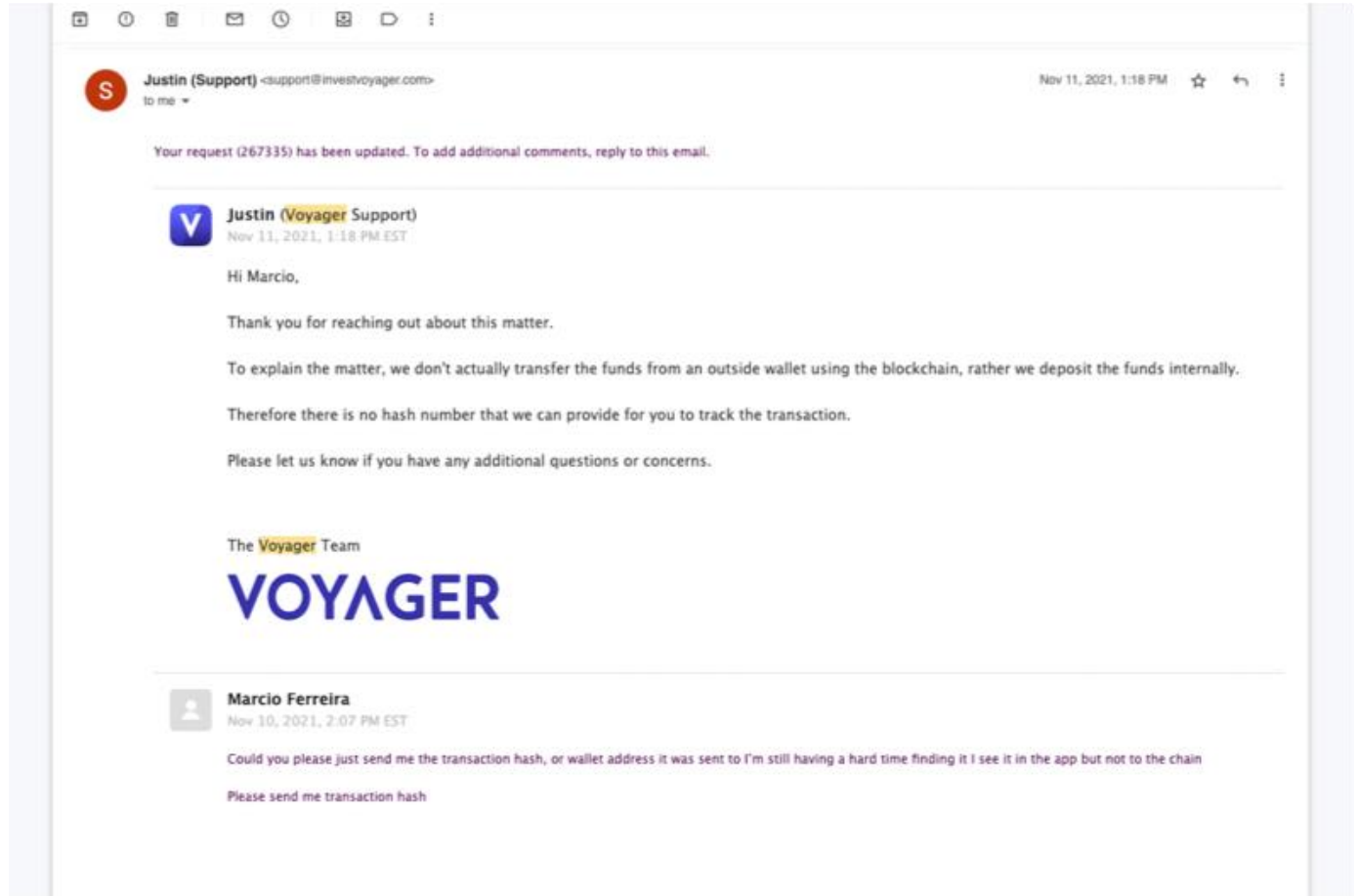
Justin,

Please clarify this for me, what does "internally" mean? did Voyager send me \$100 worth of BTC on the REAL blockchain or not?

I also see that Voyager has received my BTC transfer into my wallet address provided by voyager and transferred my BTC balance out of my wallet into another wallet with lots of other transactions I'm assuming it might be other investors' BTC too? but unless you can send me the transaction hash or wallet address, how can I check if I really have the BTC voyager is saying they sent me?

unless Voyager is running their own BTC blockchain internally and receiving Real BTC on the Real blockchain and using their own "internally" blockchain for the voyager app, please clarify this I would like to understand this, thank you.

or voyager may have just sent me \$100 USD and not BTC, waiting on your word on this, thanks.



Partial screenshot provided by Debtor's Attorney

Positions	
Asset	Quantity
USD	0.00
BTC	0.348097
ETH	0.36973
SHIB	17,628,521.2